

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

United States of America,
v.
Michael A. CASTILLO

Case No. 3:22MJ5267

AFFIDAVIT IN SUPPORT OF APPLICATION FOR ARREST WARRANT

I, Lyndsay Goschke, a Special Agent (“SA”) with Homeland Security Investigations, being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the U.S. Department of Homeland Security (DHS), Homeland Security Investigations (HSI), having served in that capacity with Homeland Security Investigations, and its predecessor, Immigration and Customs Enforcement (ICE), since January 2020. Prior to that, I was a Uniformed Division officer with the United States Secret Service (USSS) for approximately two (2) years. I am currently assigned to the Office of the Assistant Special Agent in Charge, Cleveland, Ohio. I have received training and have conducted and/or assisted in investigations involving the violation of laws pertaining to commercial fraud, immigration, cultural property, intellectual property rights (IPR), child exploitation, money laundering, and narcotics. As part of my daily duties as an HSI Special Agent, I investigate criminal violations relating to child exploitation and child pornography including violations pertaining to the illegal production, distribution, receipt and possession of child pornography, in violation of 18 U.S.C. §§ 2252(a) and 2252A. I have received training in the area of child pornography and child exploitation and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media.

2. I am an “investigative or law enforcement officer” of the United States within the meaning of Section 2510(7) of Title 18, United States Code, and am empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Section 2516 of Title 18, United States Code.

3. This affidavit is being submitted for the limited purpose of establishing probable cause that **Michael A. CASTILLO**, currently residing at 414 Laurel Ave., Port Clinton, Ohio, 43452, violated Title 18, U.S.C. §§ 2251(a) and 2252A (collectively the “Specified Federal Offenses”).

4. The statements contained in this affidavit are based upon my personal knowledge and observations, my training and experience, conversations with other law enforcement officers and witnesses, and the review of documents and records. This affidavit includes only those facts that I believe are necessary to establish probable cause and does not include all the facts uncovered during the investigation.

STATUTORY AUTHORITY

5. This investigation concerns alleged violations of the following:

- a. Title 18, United States Code, §2252A, prohibits a person from knowingly mailing, transporting, shipping, distributing, receiving, reproducing for distribution, possessing or accessing with intent to view any child pornography, as defined in 18 U.S.C. §2256(8), when such child pornography was either mailed or shipped or transported in interstate or foreign commerce by any means, including by computer, or when such child pornography was produced using materials that had traveled in interstate or foreign commerce.
- b. Title 18, United States Code § 2252(a)(4) prohibits a person from knowingly

possessing child pornography, as defined in 18 U.S.C. §2256(8), when such child pornography was either mailed or shipped or transported in interstate or foreign commerce by any means, including by computer, or when such child pornography was produced using materials that had traveled in interstate or foreign commerce.

BACKGROUND OF THE INVESTIGATION AND PROBABLE CAUSE

6. This Homeland Security Investigations (HSI) Cleveland investigation was predicated upon thirty-six (36) Cyber Tipline Reports from the National Center for Missing and Exploited Children (NCMEC). The Tipline Reports were initiated by Google, in relation to the user of the email account **castillomike1813@gmail.com**. The various Tipline Reports indicated that the user had been utilizing this email account to store child abuse imagery via Google Photos and Google Drive. The child pornography reported in these Cyber Tipline Reports is described as including images of prepubescent and pubescent minors engaged in sex acts or depicting lascivious exhibition of their genitals. The information provided from Google revealed that the likely user of this account is Michael CASTILLO, a resident of Port Clinton, Ohio.

7. Additional information provided by the Electronic Service Provider (ESP) indicated that the display name for the **castillomike1813@gmail.com** account is “mike castillo”. The Gmail account was created on March 12, 2015. The recovery phone number provided by the user for the Gmail account was **419-573-9806**. The recovery email account added by the user was **mac43452@yahoo.com**. According to Google, the last successful login to the Gmail account was provided as April 19, 2022, while using the Internet Protocol (IP) address 98.27.187.250.

8. The respective NCMEC Cyber Tipline Reports associated with the Google account **castillomike1813@gmail.com** were assigned the following report numbers: 115358573, 115372248, 115385328, 115406415, 115425977, 115443316, 115452650, 115462763,

117567770, 117577762, 117592614, 117613221, 117621040, 117631304, 117675795, 117683394, 117694914, 117706014, 117713656, 117721979, 117731076, 117741893, 117772753, 117800281, 117807848, 117816872, 121617858, 121639525, 121678577, 121694142, 121714633, 121765763, 121779534, 121788823, 122023560, and 122033455.

9. In reviewing the thirty-six (36) Cyber Tipline Reports, your Affiant discovered NCMEC received these reports from Google between January 13, 2022, and April 11, 2022. In total, Google reported the user of **castillomike1813@gmail.com** had uploaded approximately five hundred fifty-four (554) total image and video files of child exploitation to the Google Photos and Google Drive infrastructures.

10. In furtherance of this investigation, your Affiant reviewed several representative images of the 554 files included with the predicated lead information. The files were found to predominantly contain prepubescent minor females. The images and videos were found to portray children engaged in sexually explicit conduct to include lascivious exhibition of the genitals or pubic area, masturbation, and genital to genital intercourse.

11. As noted earlier in this affidavit, the Cyber Tipline Reports was found to contain a total of five hundred fifty-four (554) files of child exploitation material. Your Affiant observed approximately five hundred forty-five (545) image and video files of child exploitation material. A closer examination of these reports indicated these files were uploaded in between March 13, 2020, and January 11, 2022. Sample descriptions of four (4) of the sexually explicit (child pornography) images are as follows:

- *Google-CT-RPT-a8a82384b18c06d5e08273f452fc0895-emperor_camsxy0324.avi: This twenty-three (23) minute and ten (10) second video depicts a prepubescent minor female in a bathroom. The child is wearing*

a tank top, black shorts, and a backwards ballcap. The child appears to be taking instructions from the device she is recording from. She says, "Ask specifically what you want me to do". The child removes her pants and records herself dancing in front of the camera. The child then sits on the bathroom counter, facing away. While the camera is focused on her buttocks, the child uses her hands to expose her anus to the camera. The child attempts to insert a curling iron into her anus several times, then says, "It won't fit". The child then grabs a yellow toothbrush, wets it in the sink, and inserts it into her anus. The child then positions herself on the bathroom counter, facing the camera with her legs spread. The child inserts and withdraws the same toothbrush in her vagina several times. Her face is visible.

- *Google-CT-RPT-f5deb89709a963a48189f53d826f8115-172: This eighteen (18) minute video depicts a prepubescent minor female wearing a grey t-shirt and jeans. The child removes her clothing and sits on top of what appears to be a washer or a dryer. Her legs are spread, and her genitals are exposed. The child repeatedly rubs her vagina with her hand. The child then gets a bottle of mango juice and places it on the floor. While hovering above the bottle, the child inserts the top of the bottle in her vagina for several minutes. The child then gets into the bathtub, turns on the faucet, and records a close-up of the water pouring over her vagina. The child's face is visible.*
- *Google-CT-RPT-eaff579fc0f408225f3377eeb07c7dc9-x300: This thirty-three (33) second video depicts a naked, prepubescent minor female positioned on her back. An adult male is positioned between her legs and is engaging anal*

intercourse with the child. The child's face is visible.

- *Google-CT-RPT-2715ea30dadc2f74dd7a2d66fa1211b3.mp4: This seven (7) minute and twenty-six (26) second video depicts a prepubescent minor female sitting on the floor wearing only a red t-shirt. The child inserts and withdraws an electric toothbrush in her vagina several times. The second segment of the video shows the same child with two (2) other prepubescent minor females. Child 1 uses her fingers to separate her labia while Child 2 inserts her finger into Child 1's exposed vagina. Both children's faces are visible.*

12. An NCIC search was conducted on CASTILLO revealing a conviction for drug paraphernalia and several traffic related offenses.

13. On February 2, 2022, Supervisory Special Agent (SSA) Barry Harsa served a DHS Summons on Charter Communications, Inc. in order to obtain subscriber records related to IP address 98.27.187.250. The provider records returned the following results:

Subscriber Name: Michael Castillo
Service Address: 414 Laurel Ave, Port Clinton, OH 43252-1813
Billing Address: 414 Laurel Ave, Port Clinton, OH 43252-1813
Username/Features: castillomike1813@gmail.com, d.bonneyl@roadrunner.com
Phone Number: 419-680-2327
Account Number: 8361103400058762
MAC: 586D8FB2458A
Lease Log:
Start: 06/19/2021 @ 02:43am
End: 02/16/2022 @ 02:56pm
Account Status: Active
Connection Date: 07/09/2019

14. On February 2, 2022, Supervisory Special Agent (SSA) Barry Harsa served a DHS Summons on T-Mobile US, Incorporated. in order to obtain subscriber records related to phone number **419-573-9806**. The provider records returned the following results:

Subscriber ID: 33478930008

Personal Telephone Number (PTN / MDN): 4195739806
Status: A
Status Date: 12/9/2004 1:45:32 PM
Billing Account Number (BAN): 547841124
Account Establish Date: 12/9/2004
Account Expiration (Cancel) Date: Active through Date Searched
Account Billing Address(es):
Mike Castillo
503 West 3rd Street
Port Clinton, OH 43452
Effective: 12/9/2004
Network Access Identifier: xmikecastillo@virginmobileusa.sprintpcs.com
International Mobile Subscriber Identity(s) (IMSI): 310240139507947
Electronic Serial Number (ESN): 356892110804515

15. On February 18, 2022, Computer Forensic Analyst (CFA) Troy Bryant served a preservation request letter upon Google in relation to the contents of **castillomike1813@gmail.com**. This request was made in order to preserve all evidence associated with this email account. Google assigned internal case number 12148987 to the HSI Cleveland preservation request.

16. On May 10, 2022, your Affiant served a DHS Summons on Google, requesting account information related to email address **castillomike1813@gmail.com**. Google provided the following user information:

Google Account ID: 60609090453
Name: mike castillo
Given Name: mike
Family Name: castillo
e-Mail: castillomike1813@gmail.com
Created on: 2015-03-12 03:52:13 Z
Terms of Service IP: 24.29.247.65
Recovery e-Mail: mac43452@yahoo.com
Recovery SMS: +14195739806 [US]
IP Activity:
98.27.187.250 on 01/11/2022 @ 05:42:46 UTC

17. On June 1, 2022, your Affiant served a preservation request extension letter upon Google in relation to the contents of **castillomike1813@gmail.com**.

18. On June 3, 2022, Postal records revealed that Mike CASTILLO and Holly Boreman are receiving mail at 414 Laurel Ave., Port Clinton, Ohio, 43452. Per the Ottawa County Auditor, CASTILLO and Boreman purchased this residence in December 2020. Further investigative efforts revealed CASTILLO and Boreman appear to share a child who was born in 2015.

19. On June 8, 2022, your Affiant obtained a search warrant signed by Magistrate Judge Darrell Clay, signed on that same day, for the Google Account associated with **castillomike1813@gmail.com**. Google provided the following account information:

Google Account ID: 60609090453
Name: mike castillo
Given Name: mike
Family Name: castillo
e-Mail: castillomike1813@gmail.com
Created on: 2015-03-12 03:52:13 Z
Terms of Service IP: 24.29.247.65
Birthday: May 18, 1979
Recovery e-Mail: mac43452@yahoo.com
Recovery SMS: +14195739806 [US]
User Phone Number: +14195739806 [US]
IP Activity:
- 98.27.187.250 on 04/19/2022 @ 01:39:05 UTC
 • Raw User Agents: Mozilla/5.0 (Linux; Android 11; moto g power (2021)) AppleWebKit/537.36 (KHTML, like Gecko) Chrome 99.0.4844.73 Mobile Safari/537.36,gzip(gfe)

20. Within the Google Drive, your Affiant observed several user-created file folders containing various image and video files. Examples of file folder names included the following:

Decorations
Google Photos
Memes
New
New Pic
(A folder named after his minor child— withheld to protect the child's identity)
X

21. Many of these folders did not contain any illicit images and videos. The file folder named after CASTILLO's minor daughter did not contain any imagery meeting the federal

definition of child exploitation material. The file folder “New” contained several images and videos of child exploitation material in addition to the following file folders:

- 2 or more
- Bate
- Black
- Bottom only
- Compilation
- Dog
- Full
- Multiple vids
- NN
- Pee
- Spycam
- Top only
- XXX

22. The file folders “Multiple vids” and “X” both contained several additional file folders. Examples of those file folders included the following:

- 1 girl 2 vids
- 1 girl 4 vids (dog)
- Brother and sister 2 vids
- OmeGLE
- Stickam
- Voyeur
- Webcam – cell phone

23. Through the forensic analysis of the Google account related to **castillomike1813@gmail.com**, your Affiant observed approximately ninety-six (96) images and five-hundred fifty-seven (557) videos of child exploitation material. Two (2) files can be further described as follows:

- *15_26 1.avi: This fifteen (15) minute and twenty-six (26) second video depicts two (2) minor females. Initially, both children are fully clothed. One at a time, the children remove their pants and underwear, lay on their backs, separate their legs, and expose their vagina and anus. Each child uses her hands to separate her labia and inserts and withdraws a finger from her vagina. The camera is focused on the exposed genitals, and both children's faces are visible.*
- *Olivia-1fs3t21njxm1u.mp4: This sixteen (16) minute and forty-six (46) second video depicts a prepubescent minor female wearing a white and black striped*

shirt with black shorts. The omegle.com banner is visible at the bottom of the screen. The child stands on the bed and pulls down her shorts. The child then takes the camera and moves to another room. The child removes her shirt and exposes her chest and nipples. The child then angles the camera downward, removes her shorts and underwear, then repositions on the floor with her legs spread and the camera focused on her exposed genitals. The child positions herself on her knees, facing away from the camera, and bends forward, exposing her vagina and anus. At approximately eight (8) minutes into the video, the child inserts and withdraws a gold-colored tube-like item from her vagina for several minutes. The child's face is visible.

24. In addition to the files that met the federal definition of child exploitation material, Your Affiant observed approximately one-hundred fifty (150) images and one-hundred seventy-three (173) videos of age difficult files and/or files there were exploitative in nature but did not meet the federal definition of child exploitation material.

25. On June 28, 2022, your Affiant conducted surveillance at 414 Laurel Ave., Port Clinton, OH at approximately 0600 hours. A red Ford Focus [OH / FGC9979] was observed in the driveway of the residence. Record checks of this license plate returned to a Holly Boreman at this address.

26. On August 2, 2022, your Affiant conducted surveillance at 414 Laurel Ave., Port Clinton, OH at approximately 0700 hours. The same red Ford Focus [OH / FGC9979] was observed in the driveway of the residence.

27. On August 9, 2022, your Affiant conducted surveillance at 414 Laurel Ave., Port Clinton, OH at approximately 0830 hours. A vehicle that appeared to be registered to Holly Boreman's mother was at the residence.

SEARCH OF 414 LAUREL AVENUE, PORT CLINTON, OH 43252

28. On August 10, 2022, a search warrant authorized by Federal Magistrate Judge Darrell A. Clay was executed by HSI Cleveland at 414 Laurel Avenue, Port Clinton, OH, 43252. At the time of the search warrant, agents encountered Michael A. CASTILLO, his girlfriend,

Holly Boreman, and their shared minor child.

29. Seized during the search warrant was one (1) Motorola G Power cellphone, one (1) LG X Style cellphone, one (1) digital camera, two (2) microSD cards, and one (1) USB storage device. Computer forensics examiners were unable to conduct forensic analysis of the Motorola cellphone, digital camera, and external media storage devices on scene. A forensic preview of white LG X Style cellphone was conducted on scene revealing several files of child sex abuse material. Three (3) images can be more fully described as follows:

- *“Create DCIM thumbnail” one: This image depicts a prepubescent minor female that is naked from the waist down. The child is sitting in a chair with her legs spread. The child is using both of her hands to separate her genitals, exposing them to the camera. Her face is visible. This file was created on April 15, 2020.*
- *“Create DCIM thumbnail” two: This image depicts a prepubescent minor female nude on a couch. The child’s legs are spread and her hands are on her genitals. The words ‘Unregistered HyperCamz’ can be seen on the upper corner of the image. This file was created on May 22, 2020.*
- *“Create DCIM thumbnail” three: This image depicts a prepubescent minor female that is naked from the waist down. The child’s legs are spread and her genitals are exposed and her index finger is between her genitals. This file was created on June 3, 2020.*

30. Further examination of the white LG X Style revealed the following email accounts: castillomike1813@gmail.com, cmike9412@gmail.com, and mac43452@yahoo.com as the only accounts logged in on this cellphone. HSI Special Agent Jason Guyton and HSI Task Force Office (TFO) Molly Katusin spoke with CASTILLO’s girlfriend, Holly Boreman, about the

white LG X Style cellphone. Boreman stated the white LG X Style cellphone had been water damaged on or about June 13, 2022, but she recalled CASTILLO attempting to recover information and/or data from the device on or about the same time.

31. Also on August 10, 2022, your Affiant and TFO Justin Rotili interviewed CASTILLO. CASTILLO confirmed the Motorola G Power cellphone with a blue case and a small crack in the screen was his. CASTILLO provided the 4-digit passcode (1-8-1-3) to unlock the device.

32. During the interview, CASTILLO confirmed **419-680-2327** is his phone number. CASTILLO stated his current email address is **mac43452@yahoo.com**. When confronted with the subscriber information provided by Google for the email address **castillomike1813@gmail.com**, CASTILLO stated it was an old email address of his. CASTILLO could not recall when he last accessed **castillomike1813@gmail.com**.

33. CASTILLO stated he had searched for “teen porn” and “young porn” in the past but had also viewed child sex abuse material clearly depicting prepubescent minor females. CASTILLO stated a minor constitutes any person under the age of eighteen (18). CASTILLO stated he was not sure if child sex abuse material would be found on his devices. CASTILLO further stated he had masturbated to what he believed to be teenage pornography.

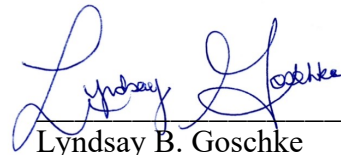
34. When confronted with the organization and labeled file folders containing child sex abuse material stored within the Google Drive account associated with email address **castillomike1813@gmail.com**, CASTILLO stated he created the file folders in order to save the child sex abuse material in a way that allowed him to easily locate and view the material after it had been saved.

35. Also on August 10, 2022, a voluntary polygraph examination of CASTILLO was

conducted by HSI Special Agent Timothy O’Sullivan. During the polygraph, CASTILLO stated his curiosity of child sex abuse material began in his late thirties. CASTILLO stated he has primarily viewed child sex abuse material involving minor female children that are approximately nine (9) to thirteen (13) years of age, but he viewed and saved content depicting minor females of all ages.

CONCLUSION

36. Based on the above information, your Affiant has probable cause to believe while in the Northern District of Ohio, Michael A. CASTILLO, the Google user **castillomike1813@gmail.com** committed the offense of possessing and/or distributing child pornography, in violation of Title 18, United States Code, §§ 2251(a) and 2252A (collectively the “Specified Federal Offenses”).



Lyndsay B. Goschke
Special Agent
Homeland Security Investigations

Sworn to via telephone after submission by reliable electronic means [Fed. R. Crim. P. 4.1 and 41(d)(3)] on this 16th day of August 2022.



DARRELL A. CLAY
UNITED STATES MAGISTRATE JUDGE